

## **EXHIBIT 2**

*Excerpts of October 31, 2024 (Volume 2),  
Deposition of Deborah D. Maxwell*

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

SHAUNA WILLIAMS, et al.,

Plaintiffs,

vs.

Case No. 23-CV-1057

## REPRESENTATIVE DESTIN

HALL, etc., et al.,

Defendants.

## NORTH CAROLINA STATE

CONFERENCE OF THE NAACP, et al.,

Plaintiffs,

vs.

Case No. 23-CV-1104

PHILIP BERGER, etc., et al.,

Defendants.

DEBORAH D. MAXWELL

Volume TT

Thursday, October 31, 2024

10:00 a.m.

Taken via videoconference

Genevie Del Valle, Court Reporter

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1 Q. It's a lot of work, right?

2 A. Yes.

3 Q. Across your time in leadership positions with the  
4 NAACP, how many members do you think you have  
5 interacted with?

6 A. I'm sorry. I -- we just had a state conference  
7 with a couple of hundred. I was at a rally with  
8 a couple of hundred. It's thousands.

9 Q. And I think you already testified to this, but do  
10 you or do you not know any of the standing  
11 members in this case personally?

12 A. I know them because standing members, two are  
13 presidents of a local branch, which is  
14 identified --

15 Q. And if we -- if some members are comfortable  
16 being publicly associated with the NAACP, does  
17 that mean that every member of the NAACP is  
18 comfortable?

19 A. Not every member is comfortable, but every person  
20 is -- will become a member financial, but not all  
21 people want to be known as a member of the NAACP.  
22 My analogy is a church. Some people jump up,  
23 running down the aisle, give half their money,  
24 and then some people just -- you never see them,  
25 they just say they're a member. And then there's

1 a little grandma who just sits there.

2 And so there's different levels of how you  
3 perceive you're giving, as you do the church, in  
4 terms of stuff and how you do at NAACP. It's how  
5 active do you want to be.

6 Q. And can you tell me why a person's specific  
7 circumstances might impact whether or not they're  
8 comfortable -- if at all, whether or not they're  
9 comfortable being publicly linked to the NAACP?

10 MS. PROUTY: Objection.

11 A. The comfortableness depends on where you are in  
12 terms of where you live and economics. We have a  
13 very controversial conservative school boards and  
14 we have a lot of teachers. Teachers can get  
15 fired at will. Law enforcement, sheriffs,  
16 sheriffs will fire you. It's an economic  
17 livelihood, and I can't afford to pay them to  
18 protest with me, as one president will tell  
19 people and he will say, I will stand in for you.  
20 You've got to keep your job. We appreciate your  
21 membership. If you wish to go, understand it may  
22 be impacting you. And people understand that.  
23 And we've seen -- you've seen people get fired  
24 for no cause because this is a nonunion state.

25 Q. I'd like to ask you about the distinction between

## C E R T I F I C A T E

The State of Ohio, ) SS:  
County of Cuyahoga.)

I, Genevie del Valle, a Notary Public within and for the State of Ohio, authorized to administer oaths and to take and certify depositions, do hereby certify that the above-named witness was by me, before the giving of their deposition, first duly sworn to testify the truth, the whole truth, and nothing but the truth; that the deposition as above-set forth was reduced to writing by me by means of stenotypy, and was later transcribed into typewriting under my direction; that this is a true record of the testimony given by the witness; that the deponent or a party requested that the deposition be reviewed by the deponent; that said deposition was taken at the aforementioned time, date and place, pursuant to notice or stipulations of counsel; that I am not a relative or employee or attorney of any of the parties, or a relative or employee of such attorney or financially interested in this action.

IN WITNESS WHEREOF, I have hereunto set my hand and seal of office, at Cleveland, Ohio, this 15th day of November 2024.

Genevieve del Valle

Genevie del Valle  
Notary Public, State of Ohio  
My commission expires September 28, 2028